

TOGUT, SEGAL & SEGAL LLP

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Attorneys for Compass Lexecon, LLC

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**NOTICE OF APPEARANCE AND
REQUEST FOR SPECIAL NOTICE**

1 TO THE COURT AND ALL PARTIES AND THEIR ATTORNEYS OF RECORD:
2
3 PLEASE TAKE NOTICE that the undersigned hereby appears as counsel for Compass
4 Lexecon, LLC (“**Compass**”) in connection with the chapter 11 cases of the above-captioned debtors
5 (the “**Debtors**”), and pursuant to Federal Rules of Bankruptcy Procedure 2002, 9007, and 9010 and
6 Bankruptcy Code Section 1109(b), requests that the following names be added to any service list in
7 these chapter 11 cases and that all notices given or required to be given in the chapter 11 cases and all
8 papers served or required to be served in these chapter 11 cases, be given and served upon:

9 **TOGUT, SEGAL & SEGAL LLP**

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24 PLEASE TAKE FURTHER NOTICE that this request includes not only notices and papers
25 referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and
26 notices of any application, motion, petition, pleading, request, complaint, or demand, whether formal
27 or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service,
28 hand-delivery, telephone, facsimile transmission, e-mail, or otherwise (1) that affects or seeks to
affect in any way any rights or interest of any creditor or party-in-interest in these chapter 11 cases,
including Compass, with respect to: (a) the Debtors; (b) property of the estate, or proceeds thereof,
in which the Debtors may claim an interest; or (c) property or proceeds thereof in the possession,

1 custody, or control of others that the Debtors may seek to use; or (2) that requires or seeks to require
2 any act, delivery, or any property, payment, or other conduct by Compass.

3 PLEASE TAKE FURTHER NOTICE that Compass does not, by filing this Notice of
4 Appearance and Request for Service of Papers nor any subsequent appearance, pleading, claim or
5 suit, submit to the jurisdiction of the Bankruptcy Court or intend that this Notice of Appearance and
6 Request for Service of Papers constitute a waiver of any of its rights: (i) to have final orders in non-
7 core matters entered only after *de novo* review by a District Judge; (ii) to trial by jury in any
8 proceeding so triable in these cases, or any controversy or proceeding related to these cases; (iii) to
9 have the District Court withdraw the reference in any matter subject to mandatory or discretionary
10 withdrawal; or (iv) any other rights, claims, actions, defenses, setoffs or recoupments to which
11 Compass is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses,
12 setoffs and recoupments Compass expressly reserves.
13

14 Dated: May 13, 2019
15

16 **SCHNADER HARRISON SEGAL & LEWIS LLP**

17
18 By: /s/ George H. Kalikman
19 George H. Kalikman (SBN 147382)

20 *and,*

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